

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7

MARGARITA ONASSIS PARLIONAS,

Case No.: 23-42029-jmm

Debtor.

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**DECLARATION OF OLGA CADIEU IN
SUPPORT OF TRUSTEE’S SALE MOTION**

Pursuant to the provisions of 28 U.S.C. § 1746, Olga Cadieu declares under the penalty of perjury, the following to be true and correct:

1. I am a licensed real estate agent associated with the real estate brokerage firm known as MVP Realty Associates, LLC (“MVP”), which maintains an office at 1495 Pine Ridge Road, Suite 1, Naples, Florida 34109.

2. This declaration is being submitted in connection with the motion of Debra Kramer, the Chapter 7 Trustee (the “Trustee”) of the estate of Margarita Onassis Parlionas (the “Debtor”), (i) authorizing the Trustee’s private sale of the Debtor’s interest in the real property commonly known as 1331 SE 8th Court, Deerfield Beach, Florida, 33441 (the “Property”) to the proposed purchaser, Vladimir Vinogradov Rev Liv TR (the “Purchaser”), free and clear of all liens, claims, encumbrances and other interests with such liens, claims, encumbrances and other interests to attach to the proceeds of the sale for good and valuable consideration; and (ii) granting such other and further relief as this Court deems just and proper under the circumstances.

3. MVP is a full-service real estate brokerage firm, which has been brokering commercial and residential real estate in Florida for over a decade. MVP is duly licensed to transact business as a real estate broker, and I am authorized to represent MVP.

4. Prior to the conversion of the Debtor's case, the Debtor, in her capacity as a debtor in possession, filed an application to retain MVP as real estate broker to the Debtor [Dkt. No. 58]. On February 8, 2024, the Court entered an Order authorizing the Debtor's retention of MVP [Dkt. No. 82].

5. On April 22, 2022, the Trustee filed an application [Dkt. No. 120] to retain MVP as her real estate broker with respect to the Property. On April 30, 2024, the Court entered an Order [Dkt. No. 122] authorizing the Trustee's retention of MVP.

6. The Property is a two-bed, two-bath residential house, which is currently vacant and appears to have several issues including electrical problems such outlets in half of the house not functioning, evidence of a possible roof leak, and evidence of a possible flood.

7. Based on my investigation, I determined that the Property maintained a market value of approximately \$600,000.00 and, on February 9, 2024, I listed the Property with a sale price of \$600,000.00.

8. MVP extensively marketed the Property and those marketing efforts consisted of, but were not limited to, the following:

- a. Photographs – MVP caused professional photographs of the property to be taken for the digital and print listings and advertisements.
- b. MLS – MVP caused the Property to be listed with a statewide multiple listing service.
- c. Zillow.com – MVP caused a listing of the Property to appear on Zillow.com. Zillow is the leading real estate and rental marketplace dedicated to empowering consumers with data, inspiration and knowledge around the place they call home. Zillow serves the full lifecycle of owning and living in a home:

buying, selling, renting, financing, remodeling and more. It starts with Zillow's living database of more than 110 million U.S. homes.

- d. Trulia.com – MVP cause a listing of the Property to appear on Trulia.com. Trulia is an American online real estate marketplace, which is a subsidiary of Zillow. It facilitates buyers and renters to find homes and neighborhoods across the United States through recommendations, local insights, and map overlays that offer details on commute, schools, churches and nearby businesses.
- e. Redfin.com – MVP caused a listing of the Property to appear on redfin.com. Redfin is a real estate brokerage firm similar to Zillow and Trulia.
- f. “For Sale” Signage – MVP caused a “For Sale” sign to be affixed in the front of the Property to attract both vehicular and pedestrian traffic.

9. MVP's marketing efforts resulted in the Debtor receiving at least three cash offers including the offer from the proposed Purchaser in the amount of \$555,000.00, which was the highest and the best offer. As such, on or about February 13, 2024, the Debtor and the Purchaser entered into a proposed contract of sale with respect to the Property. That proposed sale contract provided for a closing date of March 22, 2024. The Debtor and the Purchaser then entered into two addendums extending the closing date to March 28, 2024, and then to April 30, 2024.

10. Following the Trustee's appointment, I advised the Purchaser's representative that he would have to enter into yet another proposed sale contract, this time with the Trustee, which would require additional time to prepare, Bankruptcy Court approval, and a later closing date. Based on my conversations with the Purchaser's representative, he expressed his frustration with the multiple delays involving this sale and had considered withdrawing his offer.

11. As of the drafting of this declaration, no other parties have since expressed an interest in the Property. The Property has been tested against the market since February 9, 2024, and comparable sales appear to suggest that the offer from the Purchaser is in line with the current market.

12. As such, MVP strongly believes that the Purchaser's offer is fair and reasonable and that the best price was achieved for the sale of the Property.

Dated: May 16, 2024

/s/ Olga Cadieu
Olga Cadieu